

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:)	CHAPTER 12 PROCEEDING
)	
)	CASE NO. BK 10-43548
EULEN C. WHITTEN and DAWN M.)	Consolidated Cases
WHITTEN,)	
)	
Debtors.)	
)	
WHITTEN RANCH, INC.,)	
)	
Debtor.)	

TRUSTEE'S MOTION TO COMPEL DEBTORS TO FILE
MOTION FOR DISCHARGE WITHIN A TIME CERTAIN

COMES NOW James A. Overcash, Chapter 12 Trustee in the above-captioned matter, and moves the Court for an order compelling debtors to file a motion for discharge. In support therefore, the Trustee states as follows:

1. This case was confirmed on May 6, 2014 and the term of the plan expired on May 6, 2017.
2. The Trustee received the final plan payment on May 8, 2017, and this case should move toward discharge.

WHEREFORE, the Trustee prays that the Court enter an order compelling debtors to file a motion for discharge within a time certain and for such other and further relief as is just and equitable.

DATED: July 25, 2017

/s/ James A. Overcash

James A. Overcash
Chapter 12 Trustee
301 South 13th Street
Lincoln, NE 68508-2578
Phone: 402-437-8500
Fax: 402-437-8558

CERTIFICATE OF SERVICE

I certify that on July 25, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

NAME/EMAIL ADDRESS:

Patti H. Bass ecf@bass-associates.com
Commodity Credit Corporation - USDA (CCC) sue.cromer@ne.usda.gov,
doug.klein@ne.usda.gov;sarah.kraeger@ne.usda.gov
Shawn P. Dontigney nwisehart@perrylawfirm.com
Patricia Fahey ustpreion13.om.ecf@usdoj.gov
Richard P. Garden rgarden@clnewilliams.com, dhilger@clnewilliams.com
John M. Guthery jguthery@perrylawfirm.com, nwisehart@perrylawfirm.com
John C. Hahn bankruptcy@wolfesnowden.com
Michael F. Kivett mfkivett@walentineotoole.com
Craig A. Knickrehm cknickrehm@walentineotoole.com, jellis@womglaw.com
Eric H. Lindquist bk@elindquistlaw.com
Brandon R. Tomjack btomjack@bairdholm.com,
btaylor@bairdholm.com;cochs@bairdholm.com
Laura E. Troshynski laura@pedersonlawoffice.net
Michael J. Whaley mwhaley@grosswelch.com

and I hereby certify that I have mailed by United States Mail, postage prepaid, the foregoing document to the following non CM/ECF participants:

Luke J. Klinker
Fraser Stryker PC LLO
409 South 17th Street, Suite 500
Omaha, NE 68102

Nebraska Department Of Revenue
Attention: Bankruptcy Unit
P.O. Box 94818
Lincoln, NE 68509-4818

Thomas Watson
Nye, Hervert, Jorgensen & Watson, PC
4715 1st Avenue Place
P.O. Box 2286
Kearney, NE 68847

/s/James A. Overcash

James A. Overcash